

DANIEL SCOTT ALTER
Attorney-at-Law
360 Westchester Avenue #316
Port Chester, New York 10573
(914) 393-2388
dsa315@mac.com

May 13, 2020

Honorable James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Penny Ann Bradley, Chapter 11, Case No. 18-10122(JLG)

Hon. Judge Garrity:

This letter is written to update the Court of the status of the above-referenced Chapter 11 case.

The Debtor's last status letter was filed with the Court on April 14, 2020 [Docket No. 262].

On April 22, 2020, a hearing was held, at which, the following matters were before the Court: (i) the Case Status Conference, (ii) the NSM Motion, (iii) the Berman 9019 Motion, (iv) the Atlas Claim Objection, (v) the Pollack Claim Objection, (vi) the UST Motion, and (vii) the Debtor's Motion to Dismiss. At the hearing, *inter alia*, it was discussed that the Debtor had reached a settlement with the largest creditor of the estate (i.e. the Berman 9019 Motion) and was also near the completion of settlement negotiations with the Pollacks. At the hearing, the Court adjourned the aforementioned matters to May 19, 2020 at 2:00 p.m.

On April 28, 2020, the Court entered the Minutes from the April 22 hearing. [Docket No. 282].

The Debtor has since resolved and finalized her settlement with the Pollacks. The Debtor proposes that her Chapter 11 case be dismissed.

With regard to various administrative issues, please note the following:

- The Debtor is current with Monthly Operating Reports through December 2019. Since the global pandemic of Covid-19, the Debtor has been unable to access online banking as a Chapter 11 Debtor for the DIP account. As such, she has been unable to send them to the accountant for review and processing the operating reports. The Debtor has requested that the bank statements be sent in "paper form" and has yet to receive them, as she was evacuated from her apartment in New York City.
- The Debtor's records indicate that she is current with U.S. Trustee Quarterly fees and is fully compliant with all administrative obligations under the Bankruptcy Code, Bankruptcy Rules, Local Bankruptcy Rules, and United States Trustee Guidelines.

If the Court wishes, I will be pleased to submit any further status updates at such times as the Court may direct.

Respectfully,
/s/ Daniel S. Alter
Daniel S. Alter, Counsel for the Debtor

cc: Serene Nakano, Esq. (via email only)
Richard Levy, Esq. (via email only)
Nolan Shanahan, Esq. (via email only)
Jacob Frumkin, Esq. (via email only)
Kenneth L. Baum, Esq. (via email only)
David H. Hartheimer, Esq. (via email only)
SandraE. Mayerson, Esq. (via email only)